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MEMO ENDORSED

March 6, 2008

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anyone else's schedule -
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VIA FACSIMILE / (212) 805-6325

Hon. Colleen McMahon
United States District Judge
United States Courthouse
500 Pearl Street, Room 640
New York, New York 10007

Re: Bonomo v. Mitsubishi Int'l Corp., 07 Civ. 5967 (CM)

Dear Judge McMahon:

Colleen Mc Mahon
3/6/08

We represent the plaintiff, James Bonomo, and write on behalf of both parties to request a 30-day extension of all outstanding deadlines in the current Civil Case Management Plan, a copy of which is attached. A prior request on behalf of both parties for a 60-day extension was granted on January 8, 2008.

The parties make this request for several reasons. First, plaintiff's damages expert is facing conflicts, including a trial next week, that will preclude him from completing plaintiff's expert report by the current deadline of March 17. Second, as described in detail in the parties' prior extension request, defendant's electronic document retrieval and production has been extremely time intensive given that many of the documents are in Japanese and Chinese, which must be translated and reviewed prior to production. Third, I am scheduled to be on trial before the Honorable Denny Chin beginning April 7 in the matter of Borrero v. American Express Bank, 05 Civ. 10801.

LIDDLE & ROBINSON, L.L.P.

Hon. Colleen McMahon

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March 6, 2008

For these reasons, the parties respectfully request a 30-day extension of all outstanding deadlines. A proposed revised Civil Case Management Plan is attached.

Respectfully submitted,



Christine A. Palmieri

Attachments

cc: Glenn Grindlinger, Esq. (via electronic mail)